

EXHIBIT v

September 2023 Correspondence re ESI Order



Shirley LaVarco <shirley@civilrightscorps.org>

Response Requested: Proposed Discovery Schedule

6 messages

Shirley LaVarco <shirley@civilrightscorps.org>

Fri, Sep 15, 2023 at 5:36 PM

To: Celena Vinson <cvinson@thompsonhorton.com>

Cc: Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>

Celena,

I hope you are well. I wanted to touch base and hopefully carve out a more detailed discovery timeline. The court set dates for dispositive motions, the joint pretrial order, motions in limine, and trial. But given the condensed timeline, we thought it might be more efficient to agree on a few other dates. Here is what we'd propose:

Plaintiff's expert disclosures	Nov. 10, 2023
Defendants' expert disclosures	Dec. 6, 2023
Close of discovery	Jan. 26, 2024
Dispositive motions	Jan. 29, 2024
Pretrial disclosures	Mar. 4, 2024
Joint pretrial order & motions <i>in limine</i>	Mar. 29, 2024
Docket call for trial	Apr. 5, 2024

Please let me know if the above dates work for you or if you have any revisions. Once we nail down dates, I'd also ask the court to enter the consent proposed order regarding ESI. I've attached it here again for reference.

Best,
Shirley

Shirley LaVarco | Attorney*she/her/hers*

(202) 932-1270

Civil Rights Corps

1601 Connecticut Avenue NW, Suite 800

Washington, D.C. 20009

Admitted to practice in the District of Columbia.

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 **Dkt. 21-1 Consent Proposed Order Regarding ESI.pdf**
163K

Celena Vinson <cvinson@thompsonhorton.com>

Mon, Sep 18, 2023 at 10:03 AM

To: Shirley LaVarco <shirley@civilrightscorps.org>

Cc: Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>

Yes, good idea!

I am good with this *if* we move the defendant's expert deadline to December 15th and close discovery on January 19th. Alternatively, we could agree to the following:

Plaintiff's expert deadline November 1st

Defendant's expert deadline December 8th

Discovery deadline January 19th

This gives us a little more time for depositions.

Thanks,

Celena Vinson, Counsel

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Shirley LaVarco <shirley@civilrightscorps.org>

Tue, Sep 19, 2023 at 4:40 PM

To: Celena Vinson <cvinson@thompsonhorton.com>

Cc: Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>

Thanks, Celena. We're willing to move your expert disclosure deadline to 12/15 (keeping ours as 11/10). As for close of discovery, your proposal wouldn't quite work on our end, because it wouldn't allow us enough time to serve and receive responses to additional discovery requests after deposing Defendants' expert. However, we can agree to close discovery on 1/19, if you agree to an exception (until 1/26) exclusively to allow us to serve (and receive responses to) discovery requests arising from Defendants' expert's deposition testimony. If you are not willing to agree to that condition, we're

having trouble seeing a way to close discovery before 1/26. Please let me know if that sounds workable.

Shirley LaVarco | Attorney

she/her/hers

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Celena Vinson <cvinson@thompsonhorton.com>

Wed, Sep 20, 2023 at 11:19 AM

To: Shirley LaVarco <shirley@civilrightscorps.org>

Cc: Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>

Shirley,

I am good with your proposal below to allow limited discovery after January 19th. Please forward the proposed order so that I can review.

Thank you,

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Celena Vinson, Counsel

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Shirley LaVarco <shirley@civilrightscorps.org>

Wed, Sep 20, 2023 at 2:38 PM

To: Celena Vinson <cvinson@thompsonhorton.com>

Cc: Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>

Great. Thanks for helping to hash this out. Please see attached for a draft motion and proposed order.

Shirley LaVarco | Attorney

she/her/hers

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6 attachments

image001.png
1K



image002.png
22K

image001.png
1K



image002.png
22K

2023.09.20_Consent Proposed Docket Control Order.docx
28K



2023.09.20 Consent Mtn to Enter Consent Proposed Orders Re Scheduling & Production of ESI.docx
22K

Celena Vinson <cvinson@thompsonhorton.com>

Wed, Sep 20, 2023 at 4:16 PM

To: Shirley LaVarco <shirley@civilrightscorps.org>

Cc: Linda Price <lprice@thompsonhorton.com>, Brittany Francis <brittany@civilrightscorps.org>, Jeff Stein <jeff@civilrightscorps.org>, Cassidy Kristal-Cohen <cassidy@civilrightscorps.org>

I agree to the motion and order on behalf of my clients.

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